

**THE INSTITUTE FOR JUSTICE**

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*Attorneys for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

**JENI PEARSONS AND MICHAEL  
STORC,**

Plaintiffs,

v.

**UNITED STATES OF AMERICA;  
and Federal Bureau of Investigation  
Special Agents LYNNE ZELLHART,  
KATHRYN BAILEY DRESS,  
BRENT JAMES, WALTER DIX,  
RYAN HEATON, and LESLEY  
BUCHAN, in their individual  
capacities,**

Defendants.

Case No. 2:23-cv-07952-RGK-MAR

**AFFIDAVIT OF SERVICE**

Judge: Hon. R. Gary Klausner  
Complaint Filed: September 22, 2023  
Am. Complaint Filed: Dec. 19, 2023

1 I, Kyndra Griffin, declare and state as follows:

2 1. At the time of service, I was over 18 years of age and not a party to the  
3 above-captioned action.

4 2. I am employed by the Institute for Justice in the County of Arlington,  
5 State of Virginia. My business address is Institute for Justice, 901 N. Glebe Road,  
6 Suite 900, Arlington, VA 22203.

7 3. I hereby certify that I was directed to serve defendants by counsel  
8 Joseph Gay, admitted *pro hac vice* into this case, along with Jeffrey Atteberry of  
9 the Vora Law Firm, a member of the Bar of this Court with whom my firm is  
10 associated with as Local Counsel on this case.

11 4. I further certify that on **Friday, December 22, 2023** I caused to be  
12 served by Certified Mail true and correct copies of the following documents on  
13 Defendant Ryan Heaton:

14 ECF 44 First Amended Complaint

15 ECF 47-3 Issued Summons to Ryan Heaton (in their individual capacity)

16 ECF 48 Plaintiffs' Notice of Motion for Extension of Time for Service and  
17 Memorandum in Support

18 ECF 48-1 Declaration of Joseph Gay in Support of Motion

19 ECF 48-2 Exhibit A to Joseph Gay Declaration

20 ECF 48-3 Proposed Order on Motion for Extension of Time

21 5. I served Defendant by mailing copies of the above documents to the  
22 following persons in accordance with Fed. R. Civ. P. 4(i)(3):

23 Ryan Heaton

24 c/o U.S. Attorney General

25 Merrick Garland

26 U.S. Department of Justice

27 950 Pennsylvania Avenue, NW

28 Washington, DC 20530-0001

Ryan Heaton

c/o U.S. Attorney's Office, C.D. of California

Civil Process Clerk

Federal Building

300 North Los Angeles Street, Suite 7516

Los Angeles, California 90012-3341

1           6. I served true and correct copies of the documents listed in para. 4 on  
2 the persons and addresses listed in para. 5 via USPS certified mail by placing the  
3 documents to be served in sealed and addressed envelopes, postage prepaid, and by  
4 personally depositing the envelopes with the U.S. Postal Service Office located in  
5 Arlington, VA. I requested personal service of true and correct copies of the  
6 documents listed in para. 4 to be delivered to Defendant Ryan Heaton via process  
7 server pursuant to Fed. R. Civ. P. 4(e) with proof of service to be filed separately.

8           7. Attached to this affidavit as Exhibit A are true and correct copies of  
9 the Certified mail receipts for the above mailings reflecting tracking numbers:  
10 9589071052701400878593 (U.S. Attorney General, Merrick Garland) and  
11 9589071052701400878609 (U.S. Attorney General for the Central District of  
12 California).

13           8. Attached to this affidavit as Exhibit B are the email notifications  
14 showing that package 9589071052701400878593 (U.S. Attorney General, Merrick  
15 Garland) was delivered via individual pick-up on Tuesday December 26, 2023 and  
16 package 9589071052701400878609 (U.S. Attorney General for the Central District  
17 of California) was delivered to the front desk, reception area, or mail room on  
18 Tuesday December 26, 2023.

19  
20           I declare under penalty of perjury under the laws of the United States that the  
21 foregoing is true and correct.

22  
23           Executed this 28 day of December, 2023.

24  
25   
26 Kyndra Griffin  
27  
28